AVI-OIL

Prevention of Sexual Harassment at Workplace

AVI-OIL INDIA PVT LTD

Corporate Office: Logix City Center Office Tower, 12th Floor, Tower - A, Sector - 32, Noida, Uttar Pradesh - 201301

Plant: Village Piyala, Post Asaoti, Faridabad, Haryana-121102

HR: POSH: Rev.02: Sept 2025

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POLICY STATEMENT

AVI-OIL is committed to creating a positive work environment by ensuring a workplace free from harassment and discrimination, where employees are treated with respect and provided with the right conditions to encourage strong performance and professional conduct. The Company will not tolerate any form of sexual harassment or discrimination and will take prompt and appropriate action against such behavior.

Every complaint of sexual harassment will be addressed with confidentiality, impartiality, and timeliness, ensuring a fair investigation and corrective action where necessary. Sexual harassment includes, but is not limited to, unwelcome physical contact, requests for sexual favors, sexually colored remarks, showing of pornography, or any physical, verbal, or non-verbal conduct of a sexual nature. Retaliation related to such complaints is also strictly prohibited. An Internal Complaints Committee (ICC) has been constituted in accordance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 & will be displayed at the notice board.

False complaints or misrepresentation will also be considered a violation of this policy. Any violation may attract strict disciplinary action, up to and including termination.

01.09.2025

V K MATHEW
Chief Executive Officer

AVI-OIL

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1. INTRODUCTION TO THE POLICY

AVI-OIL adheres to all applicable labour and employment laws and those laws that pertain to the elimination of any improper employment discrimination. After the landmark judgment of the Supreme Court of India in August 1997 (Vishaka & others vs. the State of Rajasthan & others), recently the anti-sexual harassment law of India i.e. the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the "Act") and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (the "Rules") have come into force with effect from December 9, 2013.
Sexual harassment is a form of discrimination that is offensive, undermines the integrity of employment relationships and causes serious harm to the productivity, efficiency and stability of an organization. It is essential that each member of AVI-OIL deals with their colleagues and third parties with full fairness and respect and realizes that his/her behavior will be attributed to AVI-OIL and its reputation.

This Policy is crafted based on the above Act and Rules and shall be applicable to all the Employees of AVI-OIL, and has been in effect from 1st July, 2016. In the event that any Employee has any question/concern with regard to understanding the content of this Policy, they should not hesitate in seeking clarification from the Human Resources ("HR") representative of the Company. AVI-OIL reserves the rights to modify this Policy, as and when required, in whole or in part and the same shall be communicated to the Employees.

2. COMMITMENT

AVI-OIL aims to provide its employees a safe working environment and prohibits any form of sexual harassment within and outside the company/ Plant premises. AVI-OIL emphasizes that any form of sexual harassment is unacceptable and is regarded as serious misconduct as per this Policy. AVI-OIL assures all its employees that each complaint of sexual harassment will receive an appropriate, reliable, confidential, timely and impartial investigation and necessary corrective action will be taken as required as early as possible.

AVI-OIL also strives to ensure a safe and welcoming environment for all those who visit any of our locations, such as customers, vendors etc. We wish to promote and maintain a culture that ensures all associates of the Company refrain from engaging in any practices that are abusive in any form or manner whatsoever. Hence any act of sexual harassment or related retaliation against or by any associate is unacceptable.

This policy, therefore, intends to prohibit such occurrences and also details procedures to follow when an associate believes that a violation of this policy has occurred within the ambit of all applicable regulations regarding Sexual Harassment.

Making a false complaint of sexual harassment or providing false information regarding a complaint will also be treated as a violation of this policy. Violation of this policy will call for strict disciplinary action up to and including termination.

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3. APPLICABILITY

This Policy applies to all those employed and associated with the Company. They can be regular, temporary, ad hoc or daily wage-based employees. This includes contract workers, consultants, retainers, probationers, trainees, apprentices and visitors or anyone called by any other such name engaged by the Company. They could be appointed either directly or through an agent, including a contractor.

4. SCOPE

"Workplace" includes all office(s) of AVI-OIL and/or any place visited by the Employee during the course of employment, such as official functions/events, conferences, training programs and at vendors/ Customers/ contractors' location, and such transportation as provided by the Employer for undertaking such journey.

5. DEFINITIONS

a) "Aggrieved Woman" means in relation to the workplace, a woman of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent.
b) "Complaints Committee" means the ICC or the LCC, as the case may be
c) "ICC" means an Internal Complaints Committee constituted by the Company.
d) "LCC" means the Local Complaints Committee constituted under the Act. Its constitution and composition shall be governed by the Act and the Rules.
e) "Employer" means and includes any person responsible for the management, supervision and control of the Workplace (management includes the person or board or committee responsible for formulation and administration of policies for such organization).
f) "Sexual Harassment" -The Sexual harassment of a female employees consisting of any one or more of the following unwelcome acts or behavior (whether directly or by implication):
    a) physical contact and advances; or
    b) a demand or request for sexual favours; or
    c) making sexually coloured remarks; or
    d) showing pornography; or
    e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

If any of the following circumstances, (including but not limited to), occurs or is present in relation to or connected with any act or behavior of sexual harassment (i.e. there is creation of a hostile work environment), it may also amount to Sexual Harassment:

a) direct or indirect promise of preferential/special treatment in her employment; or
b) direct or indirect threat of detrimental treatment in her employment; or
c) direct or indirect threat about her present or future employment status; or
d) Interference with her work or creating an intimidating or offensive or hostile work environment for her (even if this effect was not intended by the person responsible for the conduct); or
e) Humiliating treatment likely to affect her health or safety.

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6. DUTIES OF THE EMPLOYER

The Company will take reasonable steps to ensure prevention of sexual harassment at work which may include circulating applicable policies, organizing awareness Workshops and other relevant information to all associates, including to all new joinees.

The company has to establish an ICC and provide them with facilities for dealing with the complaint and conducting an enquiry.

7. DO'S & DON'TS FOR EMPLOYEES & LINE MANAGERS

For All Employees

Do's	Don'ts
1. Maintain dignity, respect, and professionalism in all interactions.	1. Do not make sexually coloured remarks, jokes, or innuendos.
2. Immediately report any incident of sexual harassment to the ICC.	2. Do not request or demand sexual favours in any form.
3. Respect personal boundaries and maintain appropriate workplace behavior.	3. Do not circulate or display sexually explicit material (digital or physical).
4. Cooperate in inquiries conducted by the ICC, maintaining confidentiality.	4. Do not engage in unwelcome physical contact, advances, or gestures.
5. Encourage a positive and inclusive culture free from harassment.	5. Do not retaliate against a complainant, witness, or ICC member.

For Managers & Supervisors

Do's	Don'ts
1. Lead by example in upholding dignity and respect at the workplace.	1. Do not ignore or downplay complaints of harassment.
2. Ensure your team is aware of the POSH policy and reporting mechanisms.	2. Do not attempt to mediate or influence the complainant or respondent outside the ICC process.
3. Take immediate action on reported complaints by guiding employees to the ICC.	3. Do not retaliate or allow retaliation against employees raising concerns.
4. Support the ICC during investigations with required documentation and information.	4. Do not make work-related decisions (promotion, appraisal, transfer) influenced by personal bias or harassment cases.
5. Foster an environment of trust where employees feel safe to raise concerns.	

8. REDRESSAL COMMITTEE (ICC)

The Presiding Officer and every Member of the ICC shall hold office for not more than three (3) years from the date they were nominated. At all times, at least one half of the total Members of the ICC shall have to be women. The Committee will include a member from a NGO. The external Member shall be paid such fees or allowances for holding the proceedings of the ICC, by the Company, as prescribed under the Rules.

The Presiding Officer or a Member, as the case may be, shall be removed from the ICC if in case the said Presiding Officer or Member of the ICC:

- publishes or communicates to the public, press or media, the contents of the complaint of Sexual Harassment or the inquiry proceedings, etc.; or
- has been convicted for an offence, or an inquiry into an offence under any law for the time being in force is pending against him/her; or
- has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or
- has so abused his/her position so as to render his/her continuance in office prejudicial to the public interest,

In such a scenario, the vacancy created by such removal shall be filled by fresh nomination by the Company.

9. COMPOSITION OF THE ICC

The ICC shall be constituted by the Management in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and will comprise the following members:

- Presiding Officer
- Internal Members
- External Member
- Overall Requirement
    - At least 50% of the total members shall be women.

The ICC shall be reconstituted periodically as required. The details of the ICC members for the **Corporate Office, Noida,** are provided in *Annexure- CO. Noida*, and for the **Plant, Faridabad** in *Annexure- Plant, Faridabad*, for reference.

10. COMPLAINT MECHANISM

10.1 INFORMAL RESOLUTION OPTIONS

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Complaints Committee for redressal of their

grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

10.2 COMPLAINT PROCEDURE

1. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in the form of a letter/ email, preferably within 15 days of the incident but not later than three (3) months from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.

2. The Presiding Officer of the Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment, or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.

3. If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Complaints Committee.

4. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

5. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the CEO as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The CEO will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

11. DISCIPLINARY ACTION

(a) In all situations, behaviour of the convicted will be strictly monitored by the ICC or by the HR department during the post enquiry phase.
b) It could be either one or combined actions as given below:

- Written apology
- Undergoing a Counselling Session
- Carrying out community service

- Change of work assignment / transfer for either the perpetrator or the victim.
- Written warning that is to be enclosed in the convicted 's permanent file and taking a written bond of good conduct
- Reprimand or censure
- Withhold promotion till such period mentioned
- Withhold increments of pay rise till such period mentioned
- Termination from service
- Compel the respondent to pay a reasonable amount of compensation to the complainant.

The CEO of the Company or the District Officer, as the case may be, shall comply with the recommendations provided by the ICC or the LCC in its report within sixty (60) days of receiving the same.

12. APPEAL

Any person aggrieved by the recommendations made by the Complaints Committee, or non-implementation of such recommendations, may appeal within a period of ninety (90) days of such recommendations to the concerned appellate authority notified under section 2(a) of the Industrial Employment (Standing Orders) Act, 1946.

13. FALSE AND MALICIOUS COMPLAINTS

The Company strongly opposes misuse of this Policy. Where the Complaints Committee arrives at a conclusion that the (a) allegation against the Respondent is malicious; or (b) the Aggrieved Woman or any other person making the complaint has made the complaint knowing it to be false; or (c) the Aggrieved Woman or any other person has produced any forged or misleading documents, then the Complaints Committee may recommend to the Company or to the District Officer, as the case may be, suitable action to prevent recurrence and to act as a deterrent on others from raising complaints in bad faith.

14. CONFIDENTIALITY

The Company will maintain strict confidentiality at all times with regard to the complaint made by the Aggrieved Woman, the identity and address of the Aggrieved Woman, Respondent and the witnesses, any information relating to conciliation and inquiry proceedings, and recommendations of the Complaints Committee.

Further, the Company shall ensure that the above information is not published, communicated or made known to the public, press and media in any manner. In the event that any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations to be taken under the Act contravenes the said requirement, then such person shall be liable for penalty in accordance with the AVI-OIL Policy.

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15. ACCESS TO REPORTS AND DOCUMENTS

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under legal, disciplinary or other remedial processes.

16. PROTECTION TO COMPLAINANT / VICTIM

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

18. ANNUAL REPORTING & COMPLIANCE

The ICC shall hold at least one (1) meeting every year and prepare an annual report and submit the same to the Company and to the District Officer as mandated under Section 21 of the POSH Act.

Further, in accordance with the **Companies (Accounts) Second Amendment Rules, 2025**, the Company shall include necessary disclosures relating to POSH compliance in its annual filings, as prescribed.

19. RECORD KEEPING & RETENTION

- All records pertaining to complaints, inquiry proceedings, evidence, findings, and recommendations of the Internal Complaints Committee (ICC) shall be maintained in a secure and confidential manner.
- Such records shall be retained for a minimum period of eight (8) years or until the closure of any legal proceedings, whichever is later, in line with good governance practices.
- Access to these records shall be strictly restricted to authorized personnel only.

20. CONCLUSION

In conclusion, the Company reiterates its commitment to providing its employees with a workplace free from harassment/discrimination and where every employee is treated with dignity and respect.

V K MATHEW
Chief Executive Officer

01.09.2025

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Annexure- Plant, Faridabad

1st September 2025

To,
All the Employees,

Notice

Reconstitution of Internal Complaint Committee for Plant

Please note that Internal Complaint Committee (ICC) under the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** has been **reconstituted** with effect from 02.01.2025.

The ICC members are the following:-

Sr. No.	Designation	Name
1	Presiding Officer	Mrs. Monika Garg
2	External Member	Mrs. Samta Ahuja
3	Member	Ms. Blessy John
4	Member	Mrs. Santosh
5	Member	Mr. Hafij Khan

The committee will be called **"AVI-OIL Internal Complaint Committee, Plant, Faridabad".**

In case of any issue related to Sexual Harassment, the incident may be reported in writing to any member of this committee within three months from the time of incident.

For, **AVI-OIL INDIA [P] LTD**

Monika

Monika Garg
Presiding officer, ICC

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Annexure – CO. Noida

1st September 2025

To,
All the Employees,

Notice

Reconstitution of Internal Complaint Committee for Corporate Office

Please note that Internal Complaint Committee (ICC) under the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** has been **reconstituted** with effect from 02.01.2025.

The ICC members are the following: -

Sr. No.	Designation	Name
1	Presiding Officer	Mrs. Chandra Joshi
2	External Member	Mrs. Samta Ahuja
3	Member	Mr. M.E. Jaya Barathy
4	Member	Mrs. Bhavna Srivastava
5	Member	Mrs. Ambika Satish

The committee will be called **"AVI-OIL Internal Complaint Committee, Corporate Office, Noida".**

In case of any issue related to Sexual Harassment, the incident may be reported in writing to any member of this committee within three months from the time of incident.

For, **AVI-OIL INDIA [P] LTD**

Chandra Joshi
Presiding officer, ICC

AVI-OIL INDIA [P] LTD.
Joint venture of Indian Oil Corporation Ltd., Balmer Lawrie & Co. Ltd. and NYCO, France

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AS 9100:2016
ISO 9001:2015
ISO 14001:2015
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